

# Procedure for Prioritizing Chemicals for Consideration Under Proposition 65 by the “State’s Qualified Experts”

Comments made on behalf of



Consumer Healthcare Products Association



Grocery Manufacturers of America



National Food Processors Association

Meeting of the Science Advisory Board's Carcinogen Identification Committee  
November 1, 2004

# The proposed changes to the Prioritization Procedure

. . . are less scientific

do not evaluate key issues

reduce communication and information

treat Authoritative Bodies inconsistently

# No Review of New Information



Current Procedure



*Proposed Revisions*

"Assigned priorities may change as new scientifically valid toxicological information . . . becomes available." §2.1 at 2.

*Closed to new information after prioritization*

# Key Issues Not Examined



## Current Procedure

"the level of analysis employed during the course of assigning final priorities will vary according to the complexity of the toxicological issues to be addressed." § 2.2



## *Proposed Revisions*

*"Complicated scientific issues concerning chemicals under consideration are not addressed in the prioritization process . . ."*  
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# Key Issues Not Examined



Current Procedure



*Proposed Revisions*

... examines the relevance of a particular tumor type to humans

*... ignore any relevance when issues are complicated*

... examines interspecies differences in toxicity or pharmacokinetics

*... ignore these differences when issues are complicated*

# Less Communication and Information



## Current Procedure

... requires preliminary assessment of all key scientific issues raised

... provides for public workshops to discuss, define and develop complicated issues

... requires consideration of authoritative body analyses



## *Proposed Revisions*

*... avoid complicated scientific issues*

*... remove public workshop option for complicated issues*

*... treats authoritative body analyses inconsistently*

# Inconsistent Treatment of Authoritative Bodies



## Current Procedure

... considers an authoritative body opinion that a causal cancer link is supported by the evidence as 'authoritative'

... also considers a finding that a causal cancer link is not supported by the evidence as 'authoritative'

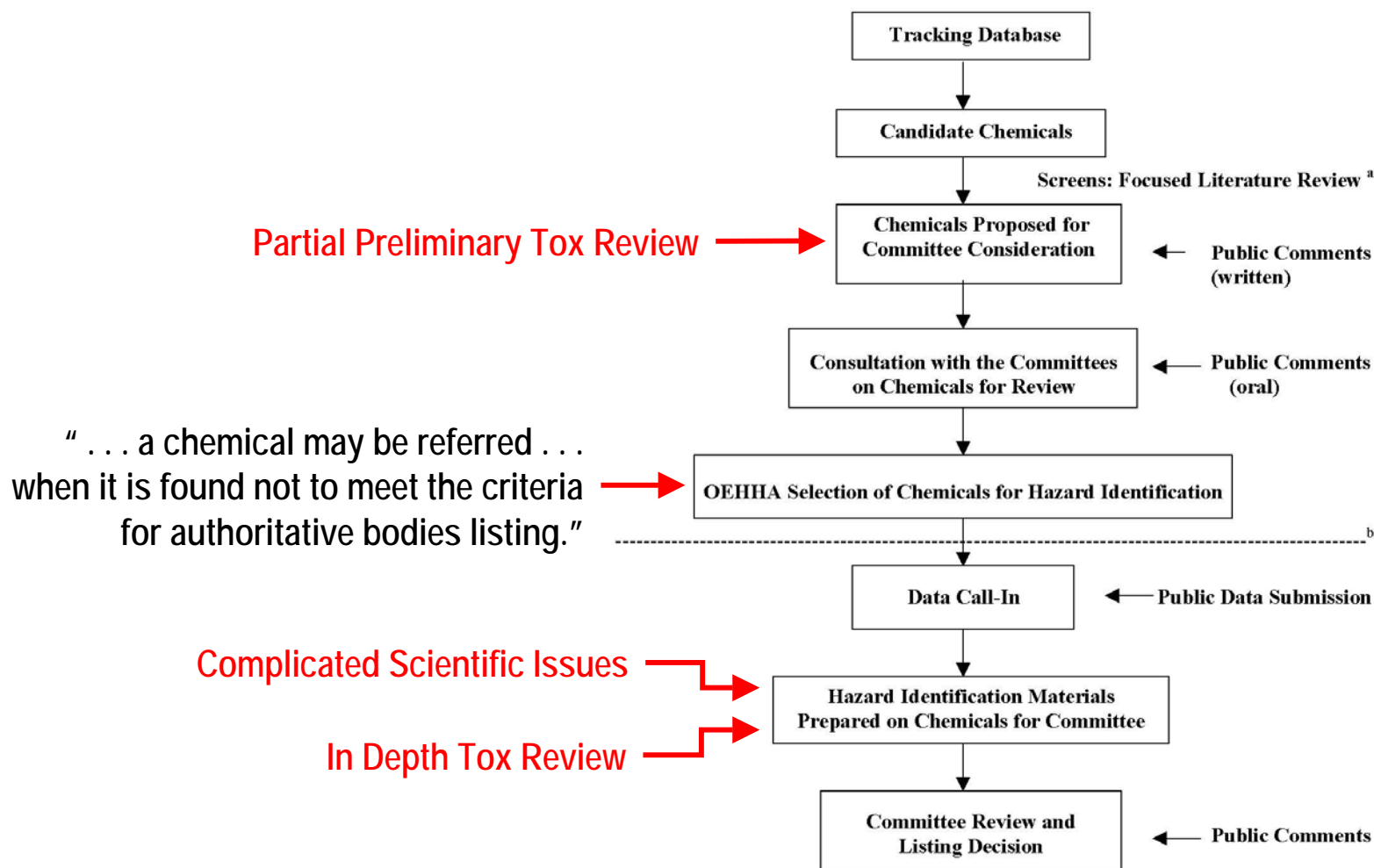


## *Proposed Revisions*

*... hold that findings that a causal cancer link is supported by the evidence are 'authoritative'*

*... hold that findings that a causal cancer link is not supported by the evidence are **not** 'authoritative'*

# Less Communication and Information Exchange



# The proposed changes to the Prioritization Procedure

. . . are less scientific

do not evaluate key issues

reduce communication and information

treat Authoritative Bodies inconsistently

CHPA, GMA and NFPA and their members  
urge the proposed revisions not be adopted.